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April 3, 2015

**VIA ECF AND FEDERAL EXPRESS**

Honorable Steven C. Mannion  
United States District Court  
District of New Jersey  
50 Walnut Street  
Newark, New Jersey 07101

Re: *ADP Dealer Services, Inc., et ano. v. S. Cal. Fleet Services, Inc., et ano.*,  
Civil Action No. 13-334 (SDW) (SCM)

Dear Judge Mannion:

We write to respectfully request a pre-motion conference to discuss SoCal's anticipated motion for an order: (a) declaring ADP in contempt of Your Honor's February 19, 2015 Order; and (b) awarding SoCal its costs and reasonable attorneys' fees incurred in connection with the motion. On February 19, the Court granted SoCal's motion to compel ADP's production of prior customer complaints and ordered ADP to "begin a rolling production of documents" by March 2, 2015. *See* Dkt. No. 76, ¶ 2(a). Despite ADP's prior representations to this Court and to me that the production would be forthcoming, ADP has yet to produce a single piece of paper.

Respectfully yours,

/s/ Carmine J. Castellano

Carmine J. Castellano

cc: Hon. Susan D. Wigenton (by regular mail)  
Robert J. Rohrberger, Esq. (by ECF)